

UNSEALED

* 7/9/15

** 7/20/15

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

United States District Court
Southern District of Texas
FILED

JUN 09 2015

[David J. Bradley, Clerk]

UNITED STATES OF AMERICA

v.

ALFONSO**JUAN/HERNANDEZ, JR. (6/22/15 cr)*** **JOSE MARIO GONZALEZ, JR.*** **CRISTOVAL JIMENEZ*** **JESSIE LEE GARCIA*** **JONATHAN CANTU**

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Criminal No.

M-15-708

SEALED INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

On or about May 7, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALFONSO
JUAN/HERNANDEZ, JR.
and
JOSE MARIO GONZALEZ, JR.**

knowingly made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn and Sporting Goods, in Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of one (1) Century Arms, model WASR-10 caliber 7.62 x 39mm rifle, in that the defendant, JOSE MARIO GONZALEZ, JR., falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that GONZALEZ, JR. was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant, MARIO GONZALEZ, JR., was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT TWO

On or about May 14, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALFONSO
JUAN/HERNANDEZ, JR.
and
CRISTOVAL JIMENEZ**

knowingly made a false statement and representation with respect to information required to be kept in the records of Point Blank Sporting Goods, in Pharr, Texas, a federally licensed firearms dealer, in connection with the acquisition of one (1) Century Arms, model C39V2, 7.62 x 39mm rifle, in that the defendant, CRISTOVAL JIMENEZ, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that CRISTOVAL JIMENEZ was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant, CRISTOVAL JIMENEZ, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT THREE

On or about May 15, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALFONSO
JUAN/HERNANDEZ, JR.
and
JESSIE LEE GARCIA**

knowingly made a false statement and representation with respect to information required to be kept in the records of Johnny's True Value, in Harlingen, Texas, a federally licensed firearms dealer, in connection with the acquisition of one (1) Century International Arms, model WASR-10, 7.62 x 39mm rifle, and one (1), Century International Arms, model DFNPA caliber

7.62 x 39 mm rifle, in that the defendant, JESSIE LEE GARCIA, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that JESSIE LEE GARCIA was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant, JESSIE LEE GARCIA, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

COUNT FOUR

On or about May 15, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**ALFONSO
JUAN HERNANDEZ, JR.
and
JONATHAN CANTU**

knowingly made a false statement and representation with respect to information required to be kept in the records of Johnny's True Value, in Harlingen, Texas, a federally licensed firearms dealer, in connection with the acquisition of one (1) Century International Arms, model C39, 7.62 x 39mm rifle, and one (1), Century International Arms, model WASR-10, 7.62 x 39 mm rifle, in that the defendant, JONATHAN CANTU, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that JONATHAN CANTU was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that defendant, JONATHAN CANTU, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

NOTICE OF FORFEITURE

18 U.S.C. §922(g)

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants,

ALFONSO

JUAN HERNANDEZ, JR.

JOSE MARIO GONZALEZ, JR.

CRISTOVAL JIMENEZ

JESSIE LEE GARCIA

and

JONATHAN CANTU

that upon conviction of a violation of Title 18, United States Code, Section 922(g), all firearms and ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

1 Romarm/Cugir, Model: WASR-10, 7.62 caliber rifle, Serial Number A1-32675-15 RO

1 Century Arms International, Model: Centurion 39 Sporter, 7.62 caliber rifle, Serial Number 39NC09132

1 Romarm/Cugir, Model: WASR-10, 7.72 caliber rifle, Serial Number A1-36059-15 RO

1 Century Arms international, Model Centurion 39, 7.62 caliber rifle, serial number C39V2A03872

1 Zastava, Model N-PAP M70, 7.62 caliber rifle, Serial Number NPDP002849

1 Romarm/Cugir, Model WASR-10, 7.62 caliber rifle, Serial Number A1-29062-14 RO

A TRUE BILL

FOREPERSON _____

KENNETH MAGIDSON
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY